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13 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LC'S MOTION TO
STRIKE WAYMO'S OPPOSITION
TO DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ACQUISITION
DOCUMENTS (DKT. 526)**

Trial Date: October 2, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Uber Technologies, Inc. and Ottomotto LLC's ("Defendants") Motion to Strike
6 Waymo's Opposition to Defendants' Administrative Motion to File Under Seal Acquisition
7 Documents (Dkt. 526).

8 2. Attached as Exhibit 1 is a true and correct copy of the Patent Local Rule 2-2
9 Interim Model Protective Order in effect in this case. (March 16, 2017 Order, Dkt. 60).

10 3. Waymo has not provided written notice or attempted to meet and confer with
11 Defendants regarding Waymo's challenge to Defendants' confidentiality designations in the
12 acquisition documents.

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct. Executed this 31st day of May, 2017, in Washington, D.C.

15
16 /s/ Michelle Yang

Michelle Yang

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19 **ATTESTATION OF E-FILED SIGNATURE**

20 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
21 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
22 concurred in this filing.

23 Dated: May 31, 2017

24 /s/ Arturo J. González

Arturo J. González